

Before the
Office of the Secretary
Federal Communications Commission
Washington DC 20554

In the Matter of
Amendment of Part 101 of the Commission's
Rules to Increase Spectrum Use Through More
Flexible Antenna Rules for the 10.7-11.7 GHz
Band

RM-11043, DA 05-114
Copy #1 of 2

ex parte Presentation
REPLY COMMENTS OF DRAGONWAVE INC.
FiberTower's waiver Request, Public Notice DA 05-114

DragonWave Inc. respectfully submits the following reply comments in support of Public Notice DA 05-114, antenna waiver request pending Commission action on a Petition for Rulemaking (*).

After studying the comments filed in this Public Notice, Dragonwave Inc. believes that use of two-foot antennas in the 11 GHz band will yield more efficient and better utilization of the spectrum, easier installation, and cost savings for users of this band. The advantage of a comparatively inexpensive mid-range solution at 11GHz makes sense, and will provide a very competitive backhaul solution to that of laying fiber or high frequency microwave susceptible to rain fade.

* Petition for Rulemaking of FiberTower, Inc., RM-11043 (filed May 26, 2004; date-stamped July 14, 2004). See Consumer & Governmental Affairs Bureau, Reference Information Center, Petition for Rulemaking Filed, Report No. 2666 (released July 23, 2004).

Dragonwave Inc. manufactures broadband high-speed wireless communications equipment, including microwave radio products, and provides solutions to a wide range of commercial and government users.

The use of a 2 foot diameter dish is a practical solution where congestion and profile are of concern. A 2 foot antenna will result in a lot lower tower stress due to wind and size as well as ease of installation. Also three to four 2 foot diameter antennas can be installed in the space required for a 4 foot diameter antenna, resulting in far better efficiencies, especially needed for Metro-Backhaul applications requiring greater capacities to accommodate data loading due to Advanced Wireless Services.

FiberTowers proposal to changes of the rules regarding coordination at 11GHz to ensure 2 foot antenna deployments do not create a disadvantage to that of 4 foot diameter antenna Fixed services users as well as satellite earth stations seems satisfactory and should allow for transparent deployment of 2 foot diameter antennas.

In conclusion, DragonWave Inc. supports FiberTowers waiver request and Petition for Rulemaking to increase spectrum usage in the 10.7-11.7 GHz band by use of more flexible antenna rules. We feel the proposal put forward will result in more efficient use of this band, providing economic benefit for end users of wireless network services.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Eric Boch', with a long horizontal line extending from the bottom of the signature.

Eric Boch, CTO, VP Engineering, Founder
DragonWave Inc.
11 November 2005

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